

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE COMPANY,

Defendant.

Civil Action Nos. 6:20-cv-00727-ADA  
6:20-cv-00728-ADA  
6:20-cv-00730-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF TIMOTHY J. ROUSSEAU IN SUPPORT OF  
BRAZOS’S SUR-REPLY IN OPPOSITION TO HPE’S MOTION TO DISMISS  
FOR LACK OF SUBJECT MATTER JURISDICTION PURSUANT TO FRCP 12(B)(1)**

I, Timothy J. Rousseau, declare as follows:

1. I am an attorney with Brown Rudnick LLP, counsel to plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”). I am a member of the bar of this Court. I submit this declaration in support of Brazos’s Sur-Reply in Opposition to Defendant Hewlett Packard Enterprise Company (“HPE”)’s Motion to Dismiss for Lack of Subject Matter Jurisdiction Pursuant to FRCP 12(b)(1). I have personal knowledge of the matters stated in this Declaration and would testify truthfully to them if called upon to do so.

2. Attached as Exhibit AA to Brazos’s Sur-Reply is a true and correct copy of the Declaration of Stuart A. Shanus, which was executed on October 29, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on October 29, 2021 in New York, New York.

/s/ Timothy J. Rousseau

Timothy J. Rousseau